

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Mary G. Yang,

Civil No. _____

Plaintiff,

v.

NOTICE OF REMOVAL

Farmers New World Life Insurance
Company, a Washington Corporation,

Defendant.

Pursuant to 28 USC §§ 1332 and 1446, Defendant Farmers New World Life Insurance Company, a Washington Corporation, hereby removes to this Court the above-captioned State Court action pending in Hennepin County District Court, Fourth Judicial District, State of Minnesota, Case No. 27-CV-15-3045.

1. Plaintiff, Mary G. Yang individually (“Plaintiff”), commenced this action against Farmers New World Life Insurance Company, a Washington Corporation (“Defendant”) on February 23, 2015 by serving a copy of the Summons and Complaint by certified mail addressed to the Commissioner of the Minnesota Department of Commerce. Defendant received the Summons and Complaint by U.S. Mail on February 27, 2015. Plaintiff has not served any other papers or pleadings with regards to this matter, to date, upon Defendant. Attached as Exhibit A is a copy of Plaintiffs’ Summons and Complaint and Affidavit of Compliance for service.

2. Plaintiff was at the time of this commencement of this action, and at the time of this Notice of Removal, a citizen of the State of Minnesota. Complaint at ¶ 1.

3. Defendant is a Washington corporation with its principal place of business in the State of Washington.

4. The Complaint alleges breach of contract regarding a \$150,000.00 death benefit life insurance policy (Policy No. 007080923) issued by Defendant to May C. Yang (deceased). Plaintiff was the beneficiary of the policy.

5. In the Complaint, Plaintiff seeks damages of the \$150,000.00 death benefit, plus interest, attorneys' fees, future benefits, and other costs.

6. The United States District Court has original jurisdiction of this matter under 28 USC § 1332 in that the amount in controversy is in excess of \$75,000.00 and is between citizens of different states.

7. The Notice of Removal is being filed within thirty (30) days of Defendant's notice of the Complaint, received on February 27, 2015, and is therefore timely, pursuant to 28 USC § 1446(b).

8. Pursuant to 28 USC § 1446(d) a copy of the Notice of Removal shall be served upon Plaintiff and a Notice of Removal shall be filed with the Clerk of the State Court.

9. Pursuant to 28 USC § 1446(a), Defendant has attached hereto, as Exhibit A, copies of all processes and pleadings served on Defendant in the state court action by Plaintiff.

Dated: March 16, 2015

Respectfully submitted,

/s/Thomas K. Klosowski

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